

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT GREENEVILLE

**NOTICE STRIKING AND/OR WITHDRAWING INTERVENOR PETER KEITH,
ESQ.'S MOTION TO INTERVENE AND TO STAY PROCEEDINGS**

NOTICE IS HEREBY GIVEN that Intervenor Peter Keith, Esq., in his capacity as the Court-Appointed Receiver for Defendant RagingBull.com, LLC (“Mr. Keith”), seeks to strike and/or withdraw his pending Motion to Intervene and to Stay Proceedings [Doc. 21] filed with the Court on January 8, 2021 (the “Motion”).

As set forth in further detail in the Motion, in litigation between Defendant RagingBull.com, LLC (“RagingBull”) and the Federal Trade Commission, Mr. Keith was appointed by the United States District Court for the District of Maryland pursuant to a Temporary Restraining Order to act as temporary receiver for RagingBull.com. Pursuant to that Temporary Restraining Order, Mr. Keith filed the Motion seeking to intervene in the present case.

On March 26, 2021, the District Court for the District of Maryland entered an Order that denied the Federal Trade Commission’s request for a preliminary injunction. A true and correct copy of the Order is attached hereto as **Exhibit A**. As set forth in the Order, the prior Temporary

Restraining Order on which Mr. Keith's Motion was based has now expired. The Order further terminates the temporary receivership of Mr. Keith over RagingBull.com and its assets. Finally, Section XIV(6) of the Order requires that Mr. Keith take all steps necessary "to withdraw from and relinquish control of any legal action in state, federal or foreign courts or arbitration proceedings that the Temporary Receiver instituted, compromised, adjusted, appeared in, intervened in, defended, disposed of, or otherwise became party to pursuant to Section XIV(M) of the TRO." **Exhibit A.**

To comply with the District Court for the District of Maryland's recent Order, Mr. Keith hereby strikes and/or withdraws the pending Motion. To further comply with the Order, counsel for Mr. Keith intend to withdraw their appearances as counsel of record in this Action.

Dated this 29th day of March, 2021.

Respectfully submitted,

BAKER DONELSON BEARMAN,
CALDWELL BERKOWITZ, P.C.

/s/ Christopher E. Thorsen

Christopher E. Thorsen (#021049)
1600 West End Avenue, Suite 2000
Nashville, TN 37203
(615) 726-5600
(615) 726-0464 (facsimile)
cthorsen@bakerdonelson.com

Nicholas W. Diegel (#034211)
265 Brookview Centre Way, Suite 600
Knoxville, TN 37919
(865) 549-7000
(865) 525-8569 (facsimile)
ndiegel@bakerdonelson.com

Meghan K. Casey (*admitted pro hac vice*)
Mark S. Saudek (*admitted pro hac vice*)
Gallagher Evelius & Jones LLP
218 N. Charles Street, Suite 400
Baltimore, MD 21201
(410) 727-7702
(410) 468-2786 (facsimile)
mcasey@gejlaw.com
msaudek@gejlaw.com

*Attorneys for Intervenor Peter Keith, Esq.,
in his capacity as Court-appointed Receiver
of RagingBull.com, LLC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 29, 2021, a true and exact copy of the foregoing **Notice Striking and/or Withdrawing Intervenor Peter Keith, Esq.'s Motion to Intervene and to Stay Proceedings** was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail or by hand delivery. Parties may access this filing through the Court's electronic filing system.

s/ Christopher E. Thorsen
Christopher E. Thorsen